

NOV 22 1995

Mr. John Mitchell, Chief
Hazardous Waste Section
Bureau of Waste Management
Kansas Department of Health and Environment
Forbes Field, Building 740
Topeka, KS 66620-0001

RCRA File Copy

Document # _____

Dear Mr. Mitchell:

Re: Unison Corporation
Brinkerhoff Road Facility
Kansas City, Kansas

I would like to thank you in advance for examining and distributing the material on the subject site. As I told you in our telephone conversation, the party taking responsibility for the facility cleanup is Union Carbide Corporation (UCC). We met with representatives of UCC last April and agreed to allow the cleanup of the solvents to proceed as a "voluntary" corrective action. We hoped that UCC would do a expeditious, thorough investigation of facility contamination, while concurrently installing remedial measures. Based upon our review of the enclosed October 1995 Geoprobe Investigation Summary Report (and previous submittals), this is not the case.

Steve Travis told me that he still had the Baseline Risk Assessment and Groundwater Quality Report and the handouts from our April 1995 meeting with UCC representatives. I understand that he has provided copies of these documents to you. In addition to the previously mentioned Geoprobe Report, I am enclosing the December 22, 1994, EPA comment letter on the Baseline Risk Assessment, along with a copy of my comments on the Geoprobe Report.

As you will see, I believe that the characterization of the extent of contamination is incomplete. Contaminant concentration contour maps in the Geoprobe Report (see Figure 2) are highly suspect. Specific concerns of the EPA (e.g., the presence and concentration of vinyl chloride, the presence/absence of a dense non-aqueous layer at the bedrock interface, extent of off-site contamination) expressed in our meeting were not addressed in the investigation.

While UCC, in the Geoprobe Investigation, concludes further action is necessary, we believe that the investigation and subsequent remediation effort would be better carried out under

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RCRA RECORDS CENTER

the guidance and oversight of a regulatory agency. We believe that the releases to environmental media can be addressed under either RCRA (Section 7003) or CERCLA (Section 106) authority. Representatives of our Toxics Substances Prevention and Planning Branch will continue oversight of the cleanup and closure of the facility buildings. We would like to offer the KDHE the opportunity to take the lead oversight role in the remediation of this facility. UCC has repeatedly expressed a desire to quickly implement remedial action at this facility; because groundwater contamination has, in all likelihood, spread beyond the facility boundaries, the EPA shares this desire. We would appreciate your response no later than December 15, 1995.

If you like, I would be happy to brief you further on the facility. If you have any questions, please contact me at (913) 551-7821.

Sincerely,

John A. DeLashmit, P.E.
Corrective Action Officer

Enclosures (3)

bcc: M. Bitney, RPCB
M. Matthews, TSPP
J. Johnson, GUTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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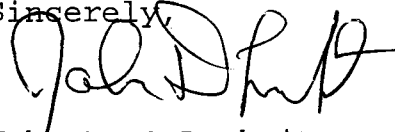
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Sincerely,

A handwritten signature in dark ink, appearing to read 'John DeLashmit', written over the word 'Sincerely,'.

John A. DeLashmit, P.E.
Corrective Action Officer

Enclosures (3)